

EXHIBIT B

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2 Cadio Zirpoli (State Bar No. 179108)
3 Christopher K. L. Young (State Bar No. 318371)
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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

Richard Kadrey, et al.,

Individual and Representative Plaintiffs,

v.

Meta Platforms, Inc.,

Defendant.

Lead Case No. 3:23-cv-03417-VC
Related Case No. 4:23-cv-06663

PLAINTIFF CHRISTOPHER GOLDEN'S
RESPONSES AND OBJECTIONS TO
DEFENDANT META PLATFORMS,
INC.'S FIRST SET OF
INTERROGATORIES

OBJECTIONS AND RESPONSES TO INDIVIDUAL INTERROGATORIES

INTERROGATORY NO. 1:

IDENTIFY all PERSONS who had a role, involvement, and/or contribution to the creation of each of YOUR ASSERTED WORKS, including by providing (i) their contact information; (ii) a description of their role, involvement, or contribution; (iii) how if at all they were compensated; and (iv) whether there is any agreement with such PERSONS relating to the ownership of YOUR ASSERTED WORKS.

RESPONSE TO INTERROGATORY NO. 1:

Subject to and without waiving any of the general objections, and subject to such additional facts that may be adduced during discovery or otherwise in this litigation, Plaintiff objects to this Interrogatory to the extent that it is compound, overbroad in nature, and is nonsensical. Each subpart is a separate Interrogatory, each which counts toward Defendant's limit under the Federal Rules. Plaintiff objects to the terms "their role, involvement, and/or contribution" as vague and ambiguous. Plaintiff objects to the term "agreement" as vague and ambiguous. Plaintiff objects to this Interrogatory as unduly burdensome, not relevant to any claim or defense, and disproportionate to the needs of the case, particularly because the interrogatory seeks "all PERSONS." Plaintiff further objects to this Interrogatory to the extent that it calls for a response subject to the attorney-client privilege, work product doctrine, and/or any other applicable privilege or protection from disclosure.

Without foregoing the above general and specific objections and to the extent possible, Plaintiff responds that he will identify only PERSONS, other than Plaintiff, a) who were direct aides (e.g., researchers), who were paid to contribute to the ASSERTED WORKS or b) those whose work was used in the ASSERTED WORKS under a license. Plaintiff responds that neither (a) nor (b) is applicable to Plaintiff's ASSERTED WORKS.

INTERROGATORY NO. 2:

IDENTIFY all PERSONS (including, but not limited to YOU and YOUR publishers) who claim an ownership interest in any of YOUR ASSERTED WORKS (whether by assignment, license, or otherwise), including by providing (i) their contact information; and (ii) a description of their ownership interest.

1 **RESPONSE TO INTERROGATORY NO. 2:**

2 Subject to and without waiving any of the general objections, and subject to such additional facts
 3 that may be adduced during discovery or otherwise in this litigation, Plaintiff objects to this
 4 Interrogatory to the extent that it is vague, ambiguous, and overbroad in nature. Plaintiff objects to this
 5 Interrogatory to the extent that the term “ownership interest” is vague and ambiguous. Plaintiff further
 6 objects to this Interrogatory as unduly burdensome, not relevant to any claim or defense, and
 7 disproportionate to the needs of the case. Plaintiff objects to this Interrogatory to the extent that it is
 8 duplicative, in whole or in part, of Meta’s First Set of Requests for Production No. 10.

9 Without foregoing the above general and specific objections and to the extent possible, Plaintiff
 10 states that pursuant to Federal Rule of Civil Procedure 33, he will produce documents, identifying all
 11 PERSONS (including, but not limited to Plaintiff and his publishers) who claim an ownership interest
 12 in any of Plaintiff’s ASSERTED WORKS (whether by assignment, license, or otherwise), which
 13 includes (i) their contact information; and (ii) a description of their ownership interest, if those
 14 documents exist. Plaintiff further refers the propounding party to Plaintiff’s response to Meta’s First
 15 Set of Requests for Production No. 10.

16 **INTERROGATORY NO. 3:**

17 IDENTIFY and DESCRIBE the basis for YOUR assertion of copyright ownership in each of
 18 YOUR respective ASSERTED WORKS, including all evidence upon which YOU based such assertion.

19 **RESPONSE TO INTERROGATORY NO. 3:**

20 Subject to and without waiving any of the general objections, and subject to such additional facts
 21 that may be adduced during discovery or otherwise in this litigation, Plaintiff objects to this
 22 Interrogatory to the extent that it is vague, ambiguous, and overbroad in nature. Plaintiff objects to this
 23 Interrogatory to the extent that the term “basis for YOUR assertion” is vague and the term “copyright
 24 ownership” is ambiguous. Plaintiff further objects to this Interrogatory as unduly burdensome, not
 25 relevant to any claim or defense, and disproportionate to the needs of the case, particularly because the
 26 interrogatory seeks “all evidence.”

1 **RESPONSE TO INTERROGATORY NO. 9:**

2 Subject to and without waiving any of the general objections, and subject to such additional facts
 3 that may be adduced during discovery or otherwise in this litigation, Plaintiff objects to this
 4 Interrogatory to the extent that it is vague, ambiguous, and overbroad in nature. Plaintiff objects to this
 5 Interrogatory to the extent that the terms “authorized channels” and “otherwise” are vague and
 6 ambiguous. Plaintiff further objects to this Interrogatory as unduly burdensome, not relevant to any
 7 claim or defense, and disproportionate to the needs of the case.

8 Without foregoing the above general and specific objections and to the extent possible, Plaintiff
 9 responds that given the requested information is unknown to Plaintiff and the Interrogatory is
 10 impossible to answer as written, Plaintiff is willing to meet and confer regarding the scope of
 11 information sought by this Interrogatory.

12 **INTERROGATORY NO. 10:**

13 DESCRIBE all damages or other injury YOU have allegedly suffered as a result of Meta’s
 14 conduct alleged in the ACTION, including but not limited to IDENTIFICATION of all bases for such
 15 damages or injury, any financial figures or DOCUMENTS used or referenced as the basis for
 16 computing such damages, methodology for computing such damages and injury, and all PERSONS who
 17 supplied knowledge or information that informed the foregoing.

18 **RESPONSE TO INTERROGATORY NO. 10:**

19 Subject to and without waiving any of the general objections, and subject to such additional facts
 20 that may be adduced during discovery or otherwise in this litigation, Plaintiff objects to this
 21 Interrogatory to the extent that it is vague, ambiguous, and overbroad in nature. Plaintiff objects to this
 22 Interrogatory to the extent that the term “damages” is vague and overbroad. Plaintiff objects to this
 23 Interrogatory as unduly burdensome, not relevant to any claim or defense, and disproportionate to the
 24 needs of the case, particularly because the interrogatory seeks “all PERSONS who supplied knowledge
 25 or information.” Plaintiff objects to this Interrogatory to the extent that it calls for a response subject to
 26 the attorney-client privilege, work product doctrine, and/or any other applicable privilege or protection
 27 from disclosure. Plaintiff further objects to this Interrogatory to the extent that it calls for information
 28 relating to damages that will be the subject of expert discovery, and objects to the extent that this

1 Interrogatory seeks information related to expert witness work product. Plaintiff objects to this
 2 Interrogatory on the grounds that such information is equally available to Defendant, or is already in its
 3 possession, custody, or control. Plaintiff objects to this Interrogatory to the extent that it is duplicative,
 4 in whole or in part, of Meta's First Set of Requests for Production Nos. 23, 24, 25, 26.

5 Without foregoing the above general and specific objections and to the extent possible, Plaintiff
 6 responds that this Interrogatory is premature, and Plaintiff will not respond to the Interrogatory at this
 7 time.

8 **INTERROGATORY NO. 11:**

9 IDENTIFY each PERSON, other than Plaintiffs' respective attorneys, who supplied
 10 information in response to Meta's discovery requests in this ACTION (including Document Requests,
 11 Requests for Admission, and Interrogatories propounded by Meta) and/or whose DOCUMENTS or
 12 data were consulted in connection with such responses, and, as to the Interrogatories, specify for which
 13 Interrogatories such PERSON has supplied information.

14 **RESPONSE TO INTERROGATORY NO. 11:**

15 Subject to and without waiving any of the general objections, and subject to such additional facts
 16 that may be adduced during discovery or otherwise in this litigation, Plaintiff objects to this
 17 Interrogatory to the extent that it is vague, ambiguous, and overbroad in nature. Plaintiff objects to this
 18 Interrogatory to the extent that the term "data" is vague and ambiguous. Plaintiff further objects to this
 19 Interrogatory as unduly burdensome, not relevant to any claim or defense, and disproportionate to the
 20 needs of the case, particularly because the interrogatory seeks "each PERSON." Plaintiff objects to this
 21 Interrogatory to the extent that it calls for a response subject to the attorney-client privilege, work
 22 product doctrine, and/or any other applicable privilege or protection from disclosure.

23 Without foregoing the above general and specific objections and to the extent possible, Plaintiff
 24 responds that Plaintiff and their counsel were the PERSONS supplying information in response to
 25 Meta's First Set of Interrogatories.

Joseph R. Saveri (State Bar No. 130064)
Cadio Zirpoli (State Bar No. 179108)
Christopher K.L. Young (State Bar No. 318371)
Travis Manfredi (State Bar No. 281779)
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Counsel for Individual and Representative Plaintiffs and the Proposed Class

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

Richard Kadrey, et al.,

Individual and Representative Plaintiffs,

V.

Meta Platforms, Inc.,

Defendant.

Lead Case No. 3:23-cv-03417-VC

**PLAINTIFF ANDREW SEAN GREER'S
RESPONSES AND OBJECTIONS TO
DEFENDANT META PLATFORMS, INC.'S
FIRST SET OF INTERROGATORIES**

OBJECTIONS AND RESPONSES TO INDIVIDUAL INTERROGATORIES

INTERROGATORY NO. 1:

IDENTIFY all PERSONS who had a role, involvement, and/or contribution to the creation of each of YOUR ASSERTED WORKS, including by providing (i) their contact information; (ii) a description of their role, involvement, or contribution; (iii) how if at all they were compensated; and (iv) whether there is any agreement with such PERSONS relating to the ownership of YOUR ASSERTED WORKS.

RESPONSE TO INTERROGATORY NO. 1:

Subject to and without waiving any of the general objections, and subject to such additional facts that may be adduced during discovery or otherwise in this litigation, Plaintiff objects to this Interrogatory to the extent that it is compound, overbroad and unduly burdensome. Each subpart is a separate Interrogatory, each which counts separately toward Plaintiffs' limit under the Federal Rules. Plaintiff objects to the terms "their role, involvement, and/or contribution" as vague and ambiguous. Plaintiff objects to the term "agreement" as vague and ambiguous. Plaintiff further objects to this Interrogatory as seeking information not relevant to any claim or defense, and disproportionate to the needs of the case, particularly because the interrogatory seeks "all PERSONS." Plaintiff further objects to this Interrogatory to the extent that it calls for a response subject to the attorney-client privilege, work product doctrine, and/or any other applicable privilege or protection from disclosure.

Subject to the above general and specific objections and to the extent possible, Plaintiff responds that he will identify only PERSONS, other than Plaintiff, a) who were direct aides (e.g., researchers), who were paid to contribute to the ASSERTED WORKS or b) those whose work was used in the ASSERTED WORKS under a license. Subject to the above general and specific objections, Plaintiff responds that neither (a) nor (b) is applicable to Plaintiff's ASSERTED WORKS.

INTERROGATORY NO. 2:

IDENTIFY all PERSONS (including, but not limited to YOU and YOUR publishers) who claim an ownership interest in any of YOUR ASSERTED WORKS (whether by assignment, license,

1 or otherwise), including by providing (i) their contact information; and (ii) a description of their
 2 ownership interest.

3 **RESPONSE TO INTERROGATORY NO. 2:**

4 Subject to and without waiving any of the general objections, and subject to such additional
 5 facts that may be adduced during discovery or otherwise in this litigation, Plaintiff objects to this
 6 Interrogatory to the extent that it is vague, ambiguous, and overbroad. Plaintiff objects to this
 7 Interrogatory to the extent that the term “ownership interest” is vague and ambiguous. Plaintiff further
 8 objects to this Interrogatory as unduly burdensome, not relevant to any claim or defense, and
 9 disproportionate to the needs of the case. Plaintiff objects to this Interrogatory to the extent that it is
 10 duplicative, in whole or in part, of Meta’s First Set of Requests for Production No. 10.

11 Subject to the above general and specific objections and to the extent possible, Plaintiff states
 12 that pursuant to Federal Rule of Civil Procedure 33, she will produce documents, identifying all
 13 PERSONS (including, but not limited to Plaintiff and his publishers) who claim an ownership interest
 14 in any of Plaintiff’s ASSERTED WORKS (whether by assignment, license, or otherwise), which
 15 includes (i) their contact information; and (ii) a description of their ownership interest, if those
 16 documents exist. Plaintiff further refers Defendant to Plaintiff’s response to Meta’s First Set of
 17 Requests for Production No. 10.

18 **INTERROGATORY NO. 3:**

19 IDENTIFY and DESCRIBE the basis for YOUR assertion of copyright ownership in each of
 20 YOUR respective ASSERTED WORKS, including all evidence upon which YOU based such
 21 assertion.

22 **RESPONSE TO INTERROGATORY NO. 3:**

23 Subject to and without waiving any of the general objections, and subject to such additional
 24 facts that may be adduced during discovery or otherwise in this litigation, Plaintiff objects to this
 25 Interrogatory to the extent that it is vague, ambiguous, and overbroad. Plaintiff objects to this
 26 Interrogatory to the extent that the term “basis for YOUR assertion” is vague and the term “copyright
 27 ownership” is ambiguous. Plaintiff further objects to this Interrogatory as unduly burdensome, not

1 Plaintiff objects to this Interrogatory to the extent that it is duplicative, in whole or in part, of
2 Interrogatory Nos. 5, 6 and 7 and Meta's First Set of Requests for Production Nos. 2 and 3.

3 Subject to the above general and specific objections and to the extent possible, Plaintiff
4 responds that Plaintiff is willing to meet and confer to narrow the scope of this Interrogatory.

5 **INTERROGATORY NO. 9:**

6 IDENTIFY all authorized channels through which YOUR ASSERTED WORKS have been
7 made available to the public, whether for sale or otherwise, including all websites (by URL) and retail
8 outlets (by name and location) and the dates they were available in such channels.

9 **RESPONSE TO INTERROGATORY NO. 9:**

10 Subject to and without waiving any of the general objections, and subject to such additional
11 facts that may be adduced during discovery or otherwise in this litigation, Plaintiff objects to this
12 Interrogatory to the extent that it is vague, ambiguous, and overbroad. Plaintiff objects to this
13 Interrogatory to the extent that the terms "authorized channels" and "otherwise" are vague and
14 ambiguous. Plaintiff further objects to this Interrogatory as unduly burdensome, not relevant to any
15 claim or defense, and disproportionate to the needs of the case.

16 Subject to the above general and specific objections and to the extent possible, Plaintiff
17 responds that given that the requested information is unknown to Plaintiff and the Interrogatory is
18 impossible to answer as written, Plaintiff is willing to meet and confer regarding the scope of
19 information sought by this Interrogatory.

20 **INTERROGATORY NO. 10:**

21 DESCRIBE all damages or other injury YOU have allegedly suffered as a result of Meta's
22 conduct alleged in the ACTION, including but not limited to IDENTIFICATION of all bases for such
23 damages or injury, any financial figures or DOCUMENTS used or referenced as the basis for
24 computing such damages, methodology for computing such damages and injury, and all PERSONS
25 who supplied knowledge or information that informed the foregoing.

26 **RESPONSE TO INTERROGATORY NO. 10:**

27 Subject to and without waiving any of the general objections, and subject to such additional
28 facts that may be adduced during discovery or otherwise in this litigation, Plaintiff objects to this

1 Interrogatory to the extent that it is vague, ambiguous, and overbroad. Plaintiff objects to this
 2 Interrogatory to the extent that the term “damages” is vague and overbroad. Plaintiff objects to this
 3 Interrogatory as unduly burdensome, not relevant to any claim or defense, and disproportionate to the
 4 needs of the case, particularly because the interrogatory seeks “all PERSONS who supplied knowledge
 5 or information.” Plaintiff objects to this Interrogatory to the extent that it calls for a response subject to
 6 the attorney-client privilege, work product doctrine, and/or any other applicable privilege or protection
 7 from disclosure. Plaintiff further objects to this Interrogatory to the extent that it is premature as it calls
 8 for information relating to damages that will be the subject of expert discovery, and objects to the
 9 extent that this Interrogatory seeks information related to expert witness work product. Plaintiff also
 10 objects to this Interrogatory on the grounds that the information requested is equally available to
 11 Defendant, or is already in its possession, custody, or control. Plaintiff objects to this Interrogatory to
 12 the extent that it is duplicative, in whole or in part, of Meta’s First Set of Requests for Production Nos.
 13 23, 24, 25, and 26.

14 Subject to the above general and specific objections Plaintiff will not respond to the
 15 Interrogatory at this time.

16 **INTERROGATORY NO. 11:**

17 IDENTIFY each PERSON, other than Plaintiffs’ respective attorneys, who supplied
 18 information in response to Meta’s discovery requests in this ACTION (including Document Requests,
 19 Requests for Admission, and Interrogatories propounded by Meta) and/or whose DOCUMENTS or
 20 data were consulted in connection with such responses, and, as to the Interrogatories, specify for which
 21 Interrogatories such PERSON has supplied information.

22 **RESPONSE TO INTERROGATORY NO. 11:**

23 Subject to and without waiving any of the general objections, and subject to such additional
 24 facts that may be adduced during discovery or otherwise in this litigation, Plaintiff objects to this
 25 Interrogatory to the extent that it is vague, ambiguous, and overbroad. Plaintiff objects to this
 26 Interrogatory to the extent that the term “data” is vague and ambiguous. Plaintiff further objects to this
 27 Interrogatory as unduly burdensome, not relevant to any claim or defense, and disproportionate to the
 28 needs of the case, particularly because the interrogatory seeks “each PERSON.” Plaintiff objects to this

1 Joseph R. Saveri (State Bar No. 130064)
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20 *Counsel for Individual and Representative
21 Plaintiffs and the Proposed Class*

22 [Additional counsel on signature page]

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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

Richard Kadrey, et al.,

Individual and Representative Plaintiffs,

v.

Meta Platforms, Inc.,

Defendant.

Lead Case No. 3:23-cv-03417-VC
Related Case No. 4:23-cv-06663

**PLAINTIFF RICHARD KADREY'S
RESPONSES AND OBJECTIONS TO
DEFENDANT META PLATFORMS,
INC.'S FIRST SET OF
INTERROGATORIES**

OBJECTIONS AND RESPONSES TO INDIVIDUAL INTERROGATORIES

INTERROGATORY NO. 1:

IDENTIFY all PERSONS who had a role, involvement, and/or contribution to the creation of each of YOUR ASSERTED WORKS, including by providing (i) their contact information; (ii) a description of their role, involvement, or contribution; (iii) how if at all they were compensated; and (iv) whether there is any agreement with such PERSONS relating to the ownership of YOUR ASSERTED WORKS.

RESPONSE TO INTERROGATORY NO. 1:

Subject to and without waiving any of the general objections, and subject to such additional facts that may be adduced during discovery or otherwise in this litigation, Plaintiff objects to this Interrogatory to the extent that it is compound, overbroad in nature, and is nonsensical. Each subpart is a separate Interrogatory, each which counts toward Defendant's limit under the Federal Rules. Plaintiff objects to the terms "their role, involvement, and/or contribution" as vague and ambiguous. Plaintiff further objects to the term "agreement" as vague and ambiguous. Plaintiff objects to this Interrogatory as unduly burdensome, not relevant to any claim or defense, and disproportionate to the needs of the case, particularly because the interrogatory seeks "all PERSONS." Plaintiff further objects to this Interrogatory to the extent that it calls for a response subject to the attorney-client privilege, work product doctrine, and/or any other applicable privilege or protection from disclosure.

Without foregoing the above general and specific objections and to the extent possible, Plaintiff responds that he will identify only PERSONS, other than Plaintiff, a) who were direct aides (e.g., researchers), who were paid to contribute to the ASSERTED WORKS or b) those whose work was used in the ASSERTED WORKS under a license. Plaintiff responds in *Sandman Slim*, lyrics from the 2002 song "Alice" were used with permission of the songwriters, Tom Waits and Kathleen Brennan. The contract granting this permission cannot be located.

INTERROGATORY NO. 2:

IDENTIFY all PERSONS (including, but not limited to YOU and YOUR publishers) who claim an ownership interest in any of YOUR ASSERTED WORKS (whether by assignment, license, or

1 otherwise), including by providing (i) their contact information; and (ii) a description of their ownership
 2 interest.

3 **RESPONSE TO INTERROGATORY NO. 2:**

4 Subject to and without waiving any of the general objections, and subject to such additional facts
 5 that may be adduced during discovery or otherwise in this litigation, Plaintiff objects to this
 6 Interrogatory to the extent that it is vague, ambiguous, and overbroad in nature. Plaintiff objects to this
 7 Interrogatory to the extent that the term “ownership interest” is vague and ambiguous. Plaintiff further
 8 objects to this Interrogatory as unduly burdensome, not relevant to any claim or defense, and
 9 disproportionate to the needs of the case. Plaintiff objects to this Interrogatory to the extent that it is
 10 duplicative, in whole or in part, of Meta’s First Set of Requests for Production No. 10.

11 Without foregoing the above general and specific objections and to the extent possible, Plaintiff
 12 states that pursuant to Federal Rule of Civil Procedure 33, he will produce documents, identifying all
 13 PERSONS (including, but not limited to Plaintiff and his publishers) who claim an ownership interest
 14 in any of Plaintiff’s ASSERTED WORKS (whether by assignment, license, or otherwise), which
 15 includes (i) their contact information; and (ii) a description of their ownership interest, if those
 16 documents exist. Plaintiff further refers the propounding party to Plaintiff’s response to Meta’s First
 17 Set of Requests for Production No. 10.

18 **INTERROGATORY NO. 3:**

19 IDENTIFY and DESCRIBE the basis for YOUR assertion of copyright ownership in each of
 20 YOUR respective ASSERTED WORKS, including all evidence upon which YOU based such assertion.

21 **RESPONSE TO INTERROGATORY NO. 3:**

22 Subject to and without waiving any of the general objections, and subject to such additional facts
 23 that may be adduced during discovery or otherwise in this litigation, Plaintiff objects to this
 24 Interrogatory to the extent that it is vague, ambiguous, and overbroad in nature. Plaintiff objects to this
 25 Interrogatory to the extent that the term “basis for YOUR assertion” is vague and the term “copyright
 26 ownership” is ambiguous. Plaintiff further objects to this Interrogatory as unduly burdensome, not
 27 relevant to any claim or defense, and disproportionate to the needs of the case, particularly because the
 28 interrogatory seeks “all evidence.”

1 **RESPONSE TO INTERROGATORY NO. 9:**

2 Subject to and without waiving any of the general objections, and subject to such additional
 3 facts that may be adduced during discovery or otherwise in this litigation, Plaintiff objects to this
 4 Interrogatory to the extent that it is vague, ambiguous, and overbroad in nature. Plaintiff objects to this
 5 Interrogatory to the extent that the terms “authorized channels” and “otherwise” are vague and
 6 ambiguous. Plaintiff further objects to this Interrogatory as unduly burdensome, not relevant to any
 7 claim or defense, and disproportionate to the needs of the case.

8 Without foregoing the above general and specific objections and to the extent possible, Plaintiff
 9 responds that given the requested information is unknown to Plaintiff and the Interrogatory is
 10 impossible to answer as written, Plaintiff is willing to meet and confer regarding the scope of
 11 information sought by this Interrogatory.

12 **INTERROGATORY NO. 10:**

13 DESCRIBE all damages or other injury YOU have allegedly suffered as a result of Meta’s
 14 conduct alleged in the ACTION, including but not limited to IDENTIFICATION of all bases for such
 15 damages or injury, any financial figures or DOCUMENTS used or referenced as the basis for
 16 computing such damages, methodology for computing such damages and injury, and all PERSONS who
 17 supplied knowledge or information that informed the foregoing.

18 **RESPONSE TO INTERROGATORY NO. 10:**

19 Subject to and without waiving any of the general objections, and subject to such additional facts
 20 that may be adduced during discovery or otherwise in this litigation, Plaintiff objects to this
 21 Interrogatory to the extent that it is vague, ambiguous, and overbroad in nature. Plaintiff objects to this
 22 Interrogatory to the extent that the term “damages” is vague and overbroad. Plaintiff objects to this
 23 Interrogatory as unduly burdensome, not relevant to any claim or defense, and disproportionate to the
 24 needs of the case, particularly because the interrogatory seeks “all PERSONS who supplied knowledge
 25 or information.” Plaintiff objects to this Interrogatory to the extent that it calls for a response subject to
 26 the attorney-client privilege, work product doctrine, and/or any other applicable privilege or protection
 27 from disclosure. Plaintiff further objects to this Interrogatory to the extent that it calls for information
 28 relating to damages that will be the subject of expert discovery, and objects to the extent that this

1 Interrogatory seeks information related to expert witness work product. Plaintiff objects to this
 2 Interrogatory on the grounds that such information is equally available to Defendant, or is already in its
 3 possession, custody, or control. Plaintiff objects to this Interrogatory to the extent that it is duplicative,
 4 in whole or in part, of Meta's First Set of Requests for Production Nos. 23, 24, 25, 26.

5 Without foregoing the above general and specific objections and to the extent possible, Plaintiff
 6 responds that this Interrogatory is premature, and Plaintiff will not respond to the Interrogatory at this
 7 time.

8 **INTERROGATORY NO. 11:**

9 IDENTIFY each PERSON, other than Plaintiffs' respective attorneys, who supplied
 10 information in response to Meta's discovery requests in this ACTION (including Document Requests,
 11 Requests for Admission, and Interrogatories propounded by Meta) and/or whose DOCUMENTS or
 12 data were consulted in connection with such responses, and, as to the Interrogatories, specify for which
 13 Interrogatories such PERSON has supplied information.

14 **RESPONSE TO INTERROGATORY NO. 11:**

15 Subject to and without waiving any of the general objections, and subject to such additional facts
 16 that may be adduced during discovery or otherwise in this litigation, Plaintiff objects to this
 17 Interrogatory to the extent that it is vague, ambiguous, and overbroad in nature. Plaintiff objects to this
 18 Interrogatory to the extent that the term "data" is vague and ambiguous. Plaintiff further objects to this
 19 Interrogatory as unduly burdensome, not relevant to any claim or defense, and disproportionate to the
 20 needs of the case, particularly because the interrogatory seeks "each PERSON." Plaintiff objects to this
 21 Interrogatory to the extent that it calls for a response subject to the attorney-client privilege, work
 22 product doctrine, and/or any other applicable privilege or protection from disclosure.

23 Without foregoing the above general and specific objections and to the extent possible, Plaintiff
 24 responds that Plaintiff and their counsel were the PERSONS supplying information in response to
 25 Meta's First Set of Interrogatories.

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21 *Counsel for Individual and Representative*
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28 **UNITED STATES DISTRICT COURT**
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

16 Richard Kadrey, et al.,

17 *Individual and Representative Plaintiffs,*

18 v.

19 Meta Platforms, Inc.,

20 *Defendant.*

21 Lead Case No. 3:23-cv-03417-VC

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28 **PLAINTIFF MATTHEW KLAM'S**
RESPONSES AND OBJECTIONS TO
DEFENDANT META PLATFORMS, INC.'S
FIRST SET OF INTERROGATORIES

OBJECTIONS AND RESPONSES TO INDIVIDUAL INTERROGATORIES

INTERROGATORY NO. 1:

IDENTIFY all PERSONS who had a role, involvement, and/or contribution to the creation of each of YOUR ASSERTED WORKS, including by providing (i) their contact information; (ii) a description of their role, involvement, or contribution; (iii) how if at all they were compensated; and (iv) whether there is any agreement with such PERSONS relating to the ownership of YOUR ASSERTED WORKS.

RESPONSE TO INTERROGATORY NO. 1:

Subject to and without waiving any of the general objections, and subject to such additional facts that may be adduced during discovery or otherwise in this litigation, Plaintiff objects to this Interrogatory to the extent that it is compound, overbroad and unduly burdensome. Each subpart is a separate Interrogatory, each which counts separately toward Plaintiffs' limit under the Federal Rules. Plaintiff objects to the terms "their role, involvement, and/or contribution" as vague and ambiguous. Plaintiff objects to the term "agreement" as vague and ambiguous. Plaintiff further objects to this Interrogatory as seeking information not relevant to any claim or defense, and disproportionate to the needs of the case, particularly because the interrogatory seeks "all PERSONS." Plaintiff further objects to this Interrogatory to the extent that it calls for a response subject to the attorney-client privilege, work product doctrine, and/or any other applicable privilege or protection from disclosure.

Subject to the above general and specific objections and to the extent possible, Plaintiff responds that he will identify only PERSONS, other than Plaintiff, a) who were direct aides (e.g., researchers), who were paid to contribute to the ASSERTED WORKS or b) those whose work was used in the ASSERTED WORKS under a license. Subject to the above general and specific objections, Plaintiff responds that he obtained permission to use seven lines from "Sea Level Elegy," by Sharon Olds in *Who is Rich?*

INTERROGATORY NO. 2:

IDENTIFY all PERSONS (including, but not limited to YOU and YOUR publishers) who claim an ownership interest in any of YOUR ASSERTED WORKS (whether by assignment, license,

1 or otherwise), including by providing (i) their contact information; and (ii) a description of their
 2 ownership interest.

3 **RESPONSE TO INTERROGATORY NO. 2:**

4 Subject to and without waiving any of the general objections, and subject to such additional
 5 facts that may be adduced during discovery or otherwise in this litigation, Plaintiff objects to this
 6 Interrogatory to the extent that it is vague, ambiguous, and overbroad. Plaintiff objects to this
 7 Interrogatory to the extent that the term “ownership interest” is vague and ambiguous. Plaintiff further
 8 objects to this Interrogatory as unduly burdensome, not relevant to any claim or defense, and
 9 disproportionate to the needs of the case. Plaintiff objects to this Interrogatory to the extent that it is
 10 duplicative, in whole or in part, of Meta’s First Set of Requests for Production No. 10.

11 Subject to the above general and specific objections and to the extent possible, Plaintiff states
 12 that pursuant to Federal Rule of Civil Procedure 33, she will produce documents, identifying all
 13 PERSONS (including, but not limited to Plaintiff and his publishers) who claim an ownership interest
 14 in any of Plaintiff’s ASSERTED WORKS (whether by assignment, license, or otherwise), which
 15 includes (i) their contact information; and (ii) a description of their ownership interest, if those
 16 documents exist. Plaintiff further refers Defendant to Plaintiff’s response to Meta’s First Set of
 17 Requests for Production No. 10.

18 **INTERROGATORY NO. 3:**

19 IDENTIFY and DESCRIBE the basis for YOUR assertion of copyright ownership in each of
 20 YOUR respective ASSERTED WORKS, including all evidence upon which YOU based such
 21 assertion.

22 **RESPONSE TO INTERROGATORY NO. 3:**

23 Subject to and without waiving any of the general objections, and subject to such additional
 24 facts that may be adduced during discovery or otherwise in this litigation, Plaintiff objects to this
 25 Interrogatory to the extent that it is vague, ambiguous, and overbroad. Plaintiff objects to this
 26 Interrogatory to the extent that the term “basis for YOUR assertion” is vague and the term “copyright
 27 ownership” is ambiguous. Plaintiff further objects to this Interrogatory as unduly burdensome, not

1 Plaintiff objects to this Interrogatory to the extent that it is duplicative, in whole or in part, of
2 Interrogatory Nos. 5, 6 and 7 and Meta's First Set of Requests for Production Nos. 2 and 3.

3 Subject to the above general and specific objections and to the extent possible, Plaintiff
4 responds that Plaintiff is willing to meet and confer to narrow the scope of this Interrogatory.

5 **INTERROGATORY NO. 9:**

6 IDENTIFY all authorized channels through which YOUR ASSERTED WORKS have been
7 made available to the public, whether for sale or otherwise, including all websites (by URL) and retail
8 outlets (by name and location) and the dates they were available in such channels.

9 **RESPONSE TO INTERROGATORY NO. 9:**

10 Subject to and without waiving any of the general objections, and subject to such additional
11 facts that may be adduced during discovery or otherwise in this litigation, Plaintiff objects to this
12 Interrogatory to the extent that it is vague, ambiguous, and overbroad. Plaintiff objects to this
13 Interrogatory to the extent that the terms "authorized channels" and "otherwise" are vague and
14 ambiguous. Plaintiff further objects to this Interrogatory as unduly burdensome, not relevant to any
15 claim or defense, and disproportionate to the needs of the case.

16 Subject to the above general and specific objections and to the extent possible, Plaintiff
17 responds that given that the requested information is unknown to Plaintiff and the Interrogatory is
18 impossible to answer as written, Plaintiff is willing to meet and confer regarding the scope of
19 information sought by this Interrogatory.

20 **INTERROGATORY NO. 10:**

21 DESCRIBE all damages or other injury YOU have allegedly suffered as a result of Meta's
22 conduct alleged in the ACTION, including but not limited to IDENTIFICATION of all bases for such
23 damages or injury, any financial figures or DOCUMENTS used or referenced as the basis for
24 computing such damages, methodology for computing such damages and injury, and all PERSONS
25 who supplied knowledge or information that informed the foregoing.

26 **RESPONSE TO INTERROGATORY NO. 10:**

27 Subject to and without waiving any of the general objections, and subject to such additional
28 facts that may be adduced during discovery or otherwise in this litigation, Plaintiff objects to this

1 Interrogatory to the extent that it is vague, ambiguous, and overbroad. Plaintiff objects to this
 2 Interrogatory to the extent that the term “damages” is vague and overbroad. Plaintiff objects to this
 3 Interrogatory as unduly burdensome, not relevant to any claim or defense, and disproportionate to the
 4 needs of the case, particularly because the interrogatory seeks “all PERSONS who supplied knowledge
 5 or information.” Plaintiff objects to this Interrogatory to the extent that it calls for a response subject to
 6 the attorney-client privilege, work product doctrine, and/or any other applicable privilege or protection
 7 from disclosure. Plaintiff further objects to this Interrogatory to the extent that it is premature as it calls
 8 for information relating to damages that will be the subject of expert discovery, and objects to the
 9 extent that this Interrogatory seeks information related to expert witness work product. Plaintiff also
 10 objects to this Interrogatory on the grounds that the information requested is equally available to
 11 Defendant, or is already in its possession, custody, or control. Plaintiff objects to this Interrogatory to
 12 the extent that it is duplicative, in whole or in part, of Meta’s First Set of Requests for Production Nos.
 13 23, 24, 25, and 26.

14 Subject to the above general and specific objections Plaintiff will not respond to the
 15 Interrogatory at this time.

16 **INTERROGATORY NO. 11:**

17 IDENTIFY each PERSON, other than Plaintiffs’ respective attorneys, who supplied
 18 information in response to Meta’s discovery requests in this ACTION (including Document Requests,
 19 Requests for Admission, and Interrogatories propounded by Meta) and/or whose DOCUMENTS or
 20 data were consulted in connection with such responses, and, as to the Interrogatories, specify for which
 21 Interrogatories such PERSON has supplied information.

22 **RESPONSE TO INTERROGATORY NO. 11:**

23 Subject to and without waiving any of the general objections, and subject to such additional
 24 facts that may be adduced during discovery or otherwise in this litigation, Plaintiff objects to this
 25 Interrogatory to the extent that it is vague, ambiguous, and overbroad. Plaintiff objects to this
 26 Interrogatory to the extent that the term “data” is vague and ambiguous. Plaintiff further objects to this
 27 Interrogatory as unduly burdensome, not relevant to any claim or defense, and disproportionate to the
 28 needs of the case, particularly because the interrogatory seeks “each PERSON.” Plaintiff objects to this

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2 Cadio Zirpoli (State Bar No. 179108)
3 Christopher K.L. Young (State Bar No. 318371)
4 Travis Manfredi (State Bar No. 281779)
5 Holden Benon (State Bar No. 325847)
6 Kathleen J. McMahon (State Bar No. 340007)
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21 *Counsel for Individual and Representative*
22 *Plaintiffs and the Proposed Class*

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28 **UNITED STATES DISTRICT COURT**
1 NORTHERN DISTRICT OF CALIFORNIA
2 SAN FRANCISCO DIVISION

3 Richard Kadrey, et al.,

4 *Individual and Representative Plaintiffs,*

5 v.

6 Meta Platforms, Inc.,

7 *Defendant.*

8 Lead Case No. 3:23-cv-03417-VC

9
10 **PLAINTIFF LAURA LIPPMAN'S**
11 **RESPONSES AND OBJECTIONS TO**
12 **DEFENDANT META PLATFORMS, INC.'S**
13 **FIRST SET OF INTERROGATORIES**

OBJECTIONS AND RESPONSES TO INDIVIDUAL INTERROGATORIES

INTERROGATORY NO. 1:

IDENTIFY all PERSONS who had a role, involvement, and/or contribution to the creation of each of YOUR ASSERTED WORKS, including by providing (i) their contact information; (ii) a description of their role, involvement, or contribution; (iii) how if at all they were compensated; and (iv) whether there is any agreement with such PERSONS relating to the ownership of YOUR ASSERTED WORKS.

RESPONSE TO INTERROGATORY NO. 1:

Subject to and without waiving any of the general objections, and subject to such additional facts that may be adduced during discovery or otherwise in this litigation, Plaintiff objects to this Interrogatory to the extent that it is compound, overbroad and unduly burdensome. Each subpart is a separate Interrogatory, each which counts separately toward Plaintiffs' limit under the Federal Rules. Plaintiff objects to the terms "their role, involvement, and/or contribution" as vague and ambiguous. Plaintiff objects to the term "agreement" as vague and ambiguous. Plaintiff further objects to this Interrogatory as seeking information not relevant to any claim or defense, and disproportionate to the needs of the case, particularly because the interrogatory seeks "all PERSONS." Plaintiff further objects to this Interrogatory to the extent that it calls for a response subject to the attorney-client privilege, work product doctrine, and/or any other applicable privilege or protection from disclosure.

Subject to the above general and specific objections and to the extent possible, Plaintiff responds that he will identify only PERSONS, other than Plaintiff, a) who were direct aides (e.g., researchers), who were paid to contribute to the ASSERTED WORKS or b) those whose work was used in the ASSERTED WORKS under a license. Subject to the above general and specific objections, Plaintiff responds that neither (a) nor (b) is applicable to Plaintiff's ASSERTED WORKS.

INTERROGATORY NO. 2:

IDENTIFY all PERSONS (including, but not limited to YOU and YOUR publishers) who claim an ownership interest in any of YOUR ASSERTED WORKS (whether by assignment, license,

1 or otherwise), including by providing (i) their contact information; and (ii) a description of their
 2 ownership interest.

3 **RESPONSE TO INTERROGATORY NO. 2:**

4 Subject to and without waiving any of the general objections, and subject to such additional
 5 facts that may be adduced during discovery or otherwise in this litigation, Plaintiff objects to this
 6 Interrogatory to the extent that it is vague, ambiguous, and overbroad. Plaintiff objects to this
 7 Interrogatory to the extent that the term “ownership interest” is vague and ambiguous. Plaintiff further
 8 objects to this Interrogatory as unduly burdensome, not relevant to any claim or defense, and
 9 disproportionate to the needs of the case. Plaintiff objects to this Interrogatory to the extent that it is
 10 duplicative, in whole or in part, of Meta’s First Set of Requests for Production No. 10.

11 Subject to the above general and specific objections and to the extent possible, Plaintiff states
 12 that pursuant to Federal Rule of Civil Procedure 33, she will produce documents, identifying all
 13 PERSONS (including, but not limited to Plaintiff and her publishers) who claim an ownership interest
 14 in any of Plaintiff’s ASSERTED WORKS (whether by assignment, license, or otherwise), which
 15 includes (i) their contact information; and (ii) a description of their ownership interest, if those
 16 documents exist. Plaintiff further refers Defendant to Plaintiff’s response to Meta’s First Set of
 17 Requests for Production No. 10.

18 **INTERROGATORY NO. 3:**

19 IDENTIFY and DESCRIBE the basis for YOUR assertion of copyright ownership in each of
 20 YOUR respective ASSERTED WORKS, including all evidence upon which YOU based such
 21 assertion.

22 **RESPONSE TO INTERROGATORY NO. 3:**

23 Subject to and without waiving any of the general objections, and subject to such additional
 24 facts that may be adduced during discovery or otherwise in this litigation, Plaintiff objects to this
 25 Interrogatory to the extent that it is vague, ambiguous, and overbroad. Plaintiff objects to this
 26 Interrogatory to the extent that the term “basis for YOUR assertion” is vague and the term “copyright
 27 ownership” is ambiguous. Plaintiff further objects to this Interrogatory as unduly burdensome, not

1 further objects to this Interrogatory to the extent that it calls for a response subject to the attorney-client
 2 privilege, work product doctrine, and/or any other applicable privilege or protection from disclosure.
 3 Plaintiff objects to this Interrogatory to the extent that it is duplicative, in whole or in part, of
 4 Interrogatory Nos. 5, 6 and 7 and Meta's First Set of Requests for Production Nos. 2 and 3.

5 Subject to the above general and specific objections and to the extent possible, Plaintiff
 6 responds that Plaintiff is willing to meet and confer to narrow the scope of this Interrogatory.

7 **INTERROGATORY NO. 9:**

8 IDENTIFY all authorized channels through which YOUR ASSERTED WORKS have been
 9 made available to the public, whether for sale or otherwise, including all websites (by URL) and retail
 10 outlets (by name and location) and the dates they were available in such channels.

11 **RESPONSE TO INTERROGATORY NO. 9:**

12 Subject to and without waiving any of the general objections, and subject to such additional
 13 facts that may be adduced during discovery or otherwise in this litigation, Plaintiff objects to this
 14 Interrogatory to the extent that it is vague, ambiguous, and overbroad. Plaintiff objects to this
 15 Interrogatory to the extent that the terms "authorized channels" and "otherwise" are vague and
 16 ambiguous. Plaintiff further objects to this Interrogatory as unduly burdensome, not relevant to any
 17 claim or defense, and disproportionate to the needs of the case.

18 Subject to the above general and specific objections and to the extent possible, Plaintiff
 19 responds that given that the requested information is unknown to Plaintiff and the Interrogatory is
 20 impossible to answer as written, Plaintiff is willing to meet and confer regarding the scope of
 21 information sought by this Interrogatory.

22 **INTERROGATORY NO. 10:**

23 DESCRIBE all damages or other injury YOU have allegedly suffered as a result of Meta's
 24 conduct alleged in the ACTION, including but not limited to IDENTIFICATION of all bases for such
 25 damages or injury, any financial figures or DOCUMENTS used or referenced as the basis for
 26 computing such damages, methodology for computing such damages and injury, and all PERSONS
 27 who supplied knowledge or information that informed the foregoing.

28 **RESPONSE TO INTERROGATORY NO. 10:**

1 Subject to and without waiving any of the general objections, and subject to such additional
 2 facts that may be adduced during discovery or otherwise in this litigation, Plaintiff objects to this
 3 Interrogatory to the extent that it is vague, ambiguous, and overbroad. Plaintiff objects to this
 4 Interrogatory to the extent that the term “damages” is vague and overbroad. Plaintiff objects to this
 5 Interrogatory as unduly burdensome, not relevant to any claim or defense, and disproportionate to the
 6 needs of the case, particularly because the interrogatory seeks “all PERSONS who supplied knowledge
 7 or information.” Plaintiff objects to this Interrogatory to the extent that it calls for a response subject to
 8 the attorney-client privilege, work product doctrine, and/or any other applicable privilege or protection
 9 from disclosure. Plaintiff further objects to this Interrogatory to the extent that it is premature as it calls
 10 for information relating to damages that will be the subject of expert discovery, and objects to the
 11 extent that this Interrogatory seeks information related to expert witness work product. Plaintiff also
 12 objects to this Interrogatory on the grounds that the information requested is equally available to
 13 Defendant, or is already in its possession, custody, or control. Plaintiff objects to this Interrogatory to
 14 the extent that it is duplicative, in whole or in part, of Meta’s First Set of Requests for Production Nos.
 15 23, 24, 25, and 26.

16 Subject to the above general and specific objections Plaintiff will not respond to the
 17 Interrogatory at this time.

18 **INTERROGATORY NO. 11:**

19 IDENTIFY each PERSON, other than Plaintiffs’ respective attorneys, who supplied
 20 information in response to Meta’s discovery requests in this ACTION (including Document Requests,
 21 Requests for Admission, and Interrogatories propounded by Meta) and/or whose DOCUMENTS or
 22 data were consulted in connection with such responses, and, as to the Interrogatories, specify for which
 23 Interrogatories such PERSON has supplied information.

24 **RESPONSE TO INTERROGATORY NO. 11:**

25 Subject to and without waiving any of the general objections, and subject to such additional
 26 facts that may be adduced during discovery or otherwise in this litigation, Plaintiff objects to this
 27 Interrogatory to the extent that it is vague, ambiguous, and overbroad. Plaintiff objects to this
 28 Interrogatory to the extent that the term “data” is vague and ambiguous. Plaintiff further objects to this

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2 Cadio Zirpoli (State Bar No. 179108)
3 Christopher K. L. Young (State Bar No. 318371)
4 Louis A. Kessler (State Bar No. 243703)
5 Holden Benon (State Bar No. 325847)
6 Kathleen J. McMahon (State Bar No. 340007)
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20 *Counsel for Individual and Representative*
21 *Plaintiffs and the Proposed Class*

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

Richard Kadrey, et al.,

Individual and Representative Plaintiffs,

v.

Meta Platforms, Inc.,

Defendant.

Lead Case No. 3:23-cv-03417-VC
Related Case No. 4:23-cv-06663

PLAINTIFF SARAH SILVERMAN'S
RESPONSES AND OBJECTIONS TO
DEFENDANT META PLATFORMS,
INC.'S FIRST SET OF
INTERROGATORIES

OBJECTIONS AND RESPONSES TO INDIVIDUAL INTERROGATORIES

INTERROGATORY NO. 1:

IDENTIFY all PERSONS who had a role, involvement, and/or contribution to the creation of each of YOUR ASSERTED WORKS, including by providing (i) their contact information; (ii) a description of their role, involvement, or contribution; (iii) how if at all they were compensated; and (iv) whether there is any agreement with such PERSONS relating to the ownership of YOUR ASSERTED WORKS.

RESPONSE TO INTERROGATORY NO. 1:

Subject to and without waiving any of the general objections, and subject to such additional facts that may be adduced during discovery or otherwise in this litigation, Plaintiff objects to this Interrogatory to the extent that it is compound, overbroad in nature, and is nonsensical. Each subpart is a separate Interrogatory, each which counts toward Defendant's limit under the Federal Rules. Plaintiff objects to the terms "their role, involvement, and/or contribution" as vague and ambiguous. Plaintiff objects to the term "agreement" as vague and ambiguous. Plaintiff objects to this Interrogatory as unduly burdensome, not relevant to any claim or defense, and disproportionate to the needs of the case, particularly because the interrogatory seeks "all PERSONS." Plaintiff further objects to this Interrogatory to the extent that it calls for a response subject to the attorney-client privilege, work product doctrine, and/or any other applicable privilege or protection from disclosure.

Without foregoing the above general and specific objections and to the extent possible, Plaintiff responds that she will identify only PERSONS, other than Plaintiff, a) who were direct aides (e.g., researchers), who were paid to contribute to the ASSERTED WORKS or b) those whose work was used in the ASSERTED WORKS under a license. Plaintiff responds for *The Bedwetter*, Dana Goodyear and Dan Sterling were contracted on a work-for-hire basis as contributors. The contracts with Ms. Goodyear and Mr. Sterling will be produced as part of Plaintiff's response to Meta's First Set of Requests for Production No. 10.

INTERROGATORY NO. 2:

IDENTIFY all PERSONS (including, but not limited to YOU and YOUR publishers) who claim an ownership interest in any of YOUR ASSERTED WORKS (whether by assignment, license, or

1 otherwise), including by providing (i) their contact information; and (ii) a description of their ownership
 2 interest.

3 **RESPONSE TO INTERROGATORY NO. 2:**

4 Subject to and without waiving any of the general objections, and subject to such additional facts
 5 that may be adduced during discovery or otherwise in this litigation, Plaintiff objects to this
 6 Interrogatory to the extent that it is vague, ambiguous, and overbroad in nature. Plaintiff objects to this
 7 Interrogatory to the extent that the term “ownership interest” is vague and ambiguous. Plaintiff further
 8 objects to this Interrogatory as unduly burdensome, not relevant to any claim or defense, and
 9 disproportionate to the needs of the case. Plaintiff objects to this Interrogatory to the extent that it is
 10 duplicative, in whole or in part, of Meta’s First Set of Requests for Production No. 10.

11 Without foregoing the above general and specific objections and to the extent possible, Plaintiff
 12 states that pursuant to Federal Rule of Civil Procedure 33, she will produce documents, identifying all
 13 PERSONS (including, but not limited to Plaintiff and her publishers) who claim an ownership interest
 14 in any of Plaintiff’s ASSERTED WORKS (whether by assignment, license, or otherwise), which
 15 includes (i) their contact information; and (ii) a description of their ownership interest, if those
 16 documents exist. Plaintiff further refers the propounding party to Plaintiff’s response to Meta’s First
 17 Set of Requests for Production No. 10.

18 **INTERROGATORY NO. 3:**

19 IDENTIFY and DESCRIBE the basis for YOUR assertion of copyright ownership in each of
 20 YOUR respective ASSERTED WORKS, including all evidence upon which YOU based such assertion.

21 **RESPONSE TO INTERROGATORY NO. 3:**

22 Subject to and without waiving any of the general objections, and subject to such additional facts
 23 that may be adduced during discovery or otherwise in this litigation, Plaintiff objects to this
 24 Interrogatory to the extent that it is vague, ambiguous, and overbroad in nature. Plaintiff objects to this
 25 Interrogatory to the extent that the term “basis for YOUR assertion” is vague and the term “copyright
 26 ownership” is ambiguous. Plaintiff further objects to this Interrogatory as unduly burdensome, not
 27 relevant to any claim or defense, and disproportionate to the needs of the case, particularly because the
 28 interrogatory seeks “all evidence.”

1 **RESPONSE TO INTERROGATORY NO. 9:**

2 Subject to and without waiving any of the general objections, and subject to such additional facts
 3 that may be adduced during discovery or otherwise in this litigation, Plaintiff objects to this
 4 Interrogatory to the extent that it is vague, ambiguous, and overbroad in nature. Plaintiff objects to this
 5 Interrogatory to the extent that the terms “authorized channels” and “otherwise” are vague and
 6 ambiguous. Plaintiff further objects to this Interrogatory as unduly burdensome, not relevant to any
 7 claim or defense, and disproportionate to the needs of the case.

8 Without foregoing the above general and specific objections and to the extent possible, Plaintiff
 9 responds that given that the requested information is unknown to Plaintiff and the Interrogatory is
 10 impossible to answer as written, Plaintiff is willing to meet and confer regarding the scope of
 11 information sought by this Interrogatory.

12 **INTERROGATORY NO. 10:**

13 DESCRIBE all damages or other injury YOU have allegedly suffered as a result of Meta’s
 14 conduct alleged in the ACTION, including but not limited to IDENTIFICATION of all bases for such
 15 damages or injury, any financial figures or DOCUMENTS used or referenced as the basis for
 16 computing such damages, methodology for computing such damages and injury, and all PERSONS who
 17 supplied knowledge or information that informed the foregoing.

18 **RESPONSE TO INTERROGATORY NO. 10:**

19 Subject to and without waiving any of the general objections, and subject to such additional facts
 20 that may be adduced during discovery or otherwise in this litigation, Plaintiff objects to this
 21 Interrogatory to the extent that it is vague, ambiguous, and overbroad in nature. Plaintiff objects to this
 22 Interrogatory to the extent that the term “damages” is vague and overbroad. Plaintiff objects to this
 23 Interrogatory as unduly burdensome, not relevant to any claim or defense, and disproportionate to the
 24 needs of the case, particularly because the interrogatory seeks “all PERSONS who supplied knowledge
 25 or information.” Plaintiff objects to this Interrogatory to the extent that it calls for a response subject to
 26 the attorney-client privilege, work product doctrine, and/or any other applicable privilege or protection
 27 from disclosure. Plaintiff further objects to this Interrogatory to the extent that it calls for information
 28 relating to damages that will be the subject of expert discovery, and objects to the extent that this

1 Interrogatory seeks information related to expert witness work product. Plaintiff objects to this
 2 Interrogatory on the grounds that such information is equally available to Defendant, or is already in its
 3 possession, custody, or control. Plaintiff objects to this Interrogatory to the extent that it is duplicative,
 4 in whole or in part, of Meta's First Set of Requests for Production Nos. 23, 24, 25, 26.

5 Without foregoing the above general and specific objections and to the extent possible, Plaintiff
 6 responds that this Interrogatory is premature, and Plaintiff will not respond to the Interrogatory at this
 7 time.

8 **INTERROGATORY NO. 11:**

9 IDENTIFY each PERSON, other than Plaintiffs' respective attorneys, who supplied
 10 information in response to Meta's discovery requests in this ACTION (including Document Requests,
 11 Requests for Admission, and Interrogatories propounded by Meta) and/or whose DOCUMENTS or
 12 data were consulted in connection with such responses, and, as to the Interrogatories, specify for which
 13 Interrogatories such PERSON has supplied information.

14 **RESPONSE TO INTERROGATORY NO. 11:**

15 Subject to and without waiving any of the general objections, and subject to such additional facts
 16 that may be adduced during discovery or otherwise in this litigation, Plaintiff objects to this
 17 Interrogatory to the extent that it is vague, ambiguous, and overbroad in nature. Plaintiff objects to this
 18 Interrogatory to the extent that the term "data" is vague and ambiguous. Plaintiff further objects to this
 19 Interrogatory as unduly burdensome, not relevant to any claim or defense, and disproportionate to the
 20 needs of the case, particularly because the interrogatory seeks "each PERSON." Plaintiff objects to this
 21 Interrogatory to the extent that it calls for a response subject to the attorney-client privilege, work
 22 product doctrine, and/or any other applicable privilege or protection from disclosure.

23 Without foregoing the above general and specific objections and to the extent possible, Plaintiff
 24 responds that Plaintiff and their counsel were the PERSONS supplying information in response to
 25 Meta's First Set of Interrogatories.

1 Joseph R. Saveri (State Bar No. 130064)
2 Cadio Zirpoli (State Bar No. 179108)
3 Christopher K.L. Young (State Bar No. 318371)
4 Travis Manfredi (State Bar No. 281779)
5 Holden Benon (State Bar No. 325847)
6 Kathleen J. McMahon (State Bar No. 340007)
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37 **UNITED STATES DISTRICT COURT**
38 **NORTHERN DISTRICT OF CALIFORNIA**
39 **SAN FRANCISCO DIVISION**

40 Richard Kadrey, et al.,

41 Lead Case No. 3:23-cv-03417-VC

42 *Individual and Representative Plaintiffs,*

43 **PLAINTIFF JACQUELINE WOODSON'S**
44 **RESPONSES AND OBJECTIONS TO**
45 **DEFENDANT META PLATFORMS, INC.'S**
46 **FIRST SET OF INTERROGATORIES**

47 v.

48 Meta Platforms, Inc.,

49 *Defendant.*

1 **INTERROGATORY NO. 2:**

2 IDENTIFY all PERSONS (including, but not limited to YOU and YOUR publishers) who
 3 claim an ownership interest in any of YOUR ASSERTED WORKS (whether by assignment, license,
 4 or otherwise), including by providing (i) their contact information; and (ii) a description of their
 5 ownership interest.

6 **RESPONSE TO INTERROGATORY NO. 2:**

7 Subject to and without waiving any of the general objections, and subject to such additional
 8 facts that may be adduced during discovery or otherwise in this litigation, Plaintiff objects to this
 9 Interrogatory to the extent that it is vague, ambiguous, and overbroad. Plaintiff objects to this
 10 Interrogatory to the extent that the term “ownership interest” is vague and ambiguous. Plaintiff further
 11 objects to this Interrogatory as unduly burdensome, not relevant to any claim or defense, and
 12 disproportionate to the needs of the case. Plaintiff objects to this Interrogatory to the extent that it is
 13 duplicative, in whole or in part, of Meta’s First Set of Requests for Production No. 10.

14 Subject to the above general and specific objections and to the extent possible, Plaintiff states
 15 that pursuant to Federal Rule of Civil Procedure 33, she will produce documents, identifying all
 16 PERSONS (including, but not limited to Plaintiff and her publishers) who claim an ownership interest
 17 in any of Plaintiff’s ASSERTED WORKS (whether by assignment, license, or otherwise), which
 18 includes (i) their contact information; and (ii) a description of their ownership interest, if those
 19 documents exist. Plaintiff further refers Defendant to Plaintiff’s response to Meta’s First Set of
 20 Requests for Production No. 10.

21 **INTERROGATORY NO. 3:**

22 IDENTIFY and DESCRIBE the basis for YOUR assertion of copyright ownership in each of
 23 YOUR respective ASSERTED WORKS, including all evidence upon which YOU based such
 24 assertion.

25 **RESPONSE TO INTERROGATORY NO. 3:**

26 Subject to and without waiving any of the general objections, and subject to such additional
 27 facts that may be adduced during discovery or otherwise in this litigation, Plaintiff objects to this
 28 Interrogatory to the extent that it is vague, ambiguous, and overbroad. Plaintiff objects to this

1 impossible to answer as written, Plaintiff is willing to meet and confer regarding the scope of
 2 information sought by this Interrogatory.

3 **INTERROGATORY NO. 10:**

4 DESCRIBE all damages or other injury YOU have allegedly suffered as a result of Meta's
 5 conduct alleged in the ACTION, including but not limited to IDENTIFICATION of all bases for such
 6 damages or injury, any financial figures or DOCUMENTS used or referenced as the basis for
 7 computing such damages, methodology for computing such damages and injury, and all PERSONS
 8 who supplied knowledge or information that informed the foregoing.

9 **RESPONSE TO INTERROGATORY NO. 10:**

10 Subject to and without waiving any of the general objections, and subject to such additional
 11 facts that may be adduced during discovery or otherwise in this litigation, Plaintiff objects to this
 12 Interrogatory to the extent that it is vague, ambiguous, and overbroad. Plaintiff objects to this
 13 Interrogatory to the extent that the term "damages" is vague and overbroad. Plaintiff objects to this
 14 Interrogatory as unduly burdensome, not relevant to any claim or defense, and disproportionate to the
 15 needs of the case, particularly because the interrogatory seeks "all PERSONS who supplied knowledge
 16 or information." Plaintiff objects to this Interrogatory to the extent that it calls for a response subject to
 17 the attorney-client privilege, work product doctrine, and/or any other applicable privilege or protection
 18 from disclosure. Plaintiff further objects to this Interrogatory to the extent that it is premature as it calls
 19 for information relating to damages that will be the subject of expert discovery, and objects to the
 20 extent that this Interrogatory seeks information related to expert witness work product. Plaintiff also
 21 objects to this Interrogatory on the grounds that the information requested is equally available to
 22 Defendant, or is already in its possession, custody, or control. Plaintiff objects to this Interrogatory to
 23 the extent that it is duplicative, in whole or in part, of Meta's First Set of Requests for Production Nos.
 24 23, 24, 25, and 26.

25 Subject to the above general and specific objections Plaintiff will not respond to the
 26 Interrogatory at this time.

1 Joseph R. Saveri (State Bar No. 130064)
2 Cadio Zirpoli (State Bar No. 179108)
3 Christopher K.L. Young (State Bar No.
318371)
4 Travis Manfredi (State Bar No. 281779)
5 Holden Benon (State Bar No. 325847)
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14 *Counsel for Individual and Representative
15 Plaintiffs and the Proposed Class*

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

Richard Kadrey, et al.,

Individual and Representative Plaintiffs,

v.

Meta Platforms, Inc.,

Defendant.

Lead Case No. 3:23-cv-03417-VC

**PLAINTIFF TA-NEHISI COATES'S
RESPONSES AND OBJECTIONS TO
DEFENDANT META PLATFORMS, INC.'S
FIRST SET OF INTERROGATORIES**

1 **INTERROGATORY NO. 2:**

2 IDENTIFY all PERSONS (including, but not limited to YOU and YOUR publishers) who
3 claim an ownership interest in any of YOUR ASSERTED WORKS (whether by assignment,
4 license, or otherwise), including by providing (i) their contact information; and (ii) a description
5 of their ownership interest.

6 **RESPONSE TO INTERROGATORY NO. 2:**

7 Subject to and without waiving any of the general objections, and subject to such
8 additional facts that may be adduced during discovery or otherwise in this litigation, Plaintiff
9 objects to this Interrogatory to the extent that it is vague, ambiguous, and overbroad. Plaintiff
10 objects to this Interrogatory to the extent that the term "ownership interest" is vague and
11 ambiguous. Plaintiff further objects to this Interrogatory as unduly burdensome, not relevant to
12 any claim or defense, and disproportionate to the needs of the case. Plaintiff objects to this
13 Interrogatory to the extent that it is duplicative, in whole or in part, of Meta's First Set of
14 Requests for Production No. 10.

15 Subject to the above general and specific objections and to the extent possible,
16 Plaintiff states that pursuant to Federal Rule of Civil Procedure 33, she will produce
17 documents, identifying all PERSONS (including, but not limited to Plaintiff and his publishers)
18 who claim an ownership interest in any of Plaintiff's ASSERTED WORKS (whether by
19 assignment, license, or otherwise), which includes (i) their contact information; and (ii) a
20 description of their ownership interest, if those documents exist. Plaintiff further refers
21 Defendant to Plaintiff's response to Meta's First Set of Requests for Production No. 10.

22 **INTERROGATORY NO. 3:**

23 IDENTIFY and DESCRIBE the basis for YOUR assertion of copyright ownership in
24 each of YOUR respective ASSERTED WORKS, including all evidence upon which YOU
25 based such assertion.

26 **RESPONSE TO INTERROGATORY NO. 3:**

27 Subject to and without waiving any of the general objections, and subject to such
28 additional facts that may be adduced during discovery or otherwise in this litigation, Plaintiff

1 objects to this Interrogatory as unduly burdensome, not relevant to any claim or defense, and
 2 disproportionate to the needs of the case, particularly because the interrogatory seeks “any
 3 COMMUNICATIONS.” Plaintiff further objects to this Interrogatory to the extent that it calls for
 4 a response subject to the attorney-client privilege, work product doctrine, and/or any other
 5 applicable privilege or protection from disclosure. Plaintiff objects to this Interrogatory to the
 6 extent that it is duplicative, in whole or in part, of Interrogatory Nos. 5, 6 and 7 and Meta’s
 7 First Set of Requests for Production Nos. 2 and 3.

8 Subject to the above general and specific objections and to the extent possible,
 9 Plaintiff responds that Plaintiff is willing to meet and confer to narrow the scope of this
 10 Interrogatory.

11 **INTERROGATORY NO. 9:**

12 IDENTIFY all authorized channels through which YOUR ASSERTED WORKS have
 13 been made available to the public, whether for sale or otherwise, including all websites (by
 14 URL) and retail outlets (by name and location) and the dates they were available in such
 15 channels.

16 **RESPONSE TO INTERROGATORY NO. 9:**

17 Subject to and without waiving any of the general objections, and subject to such
 18 additional facts that may be adduced during discovery or otherwise in this litigation, Plaintiff
 19 objects to this Interrogatory to the extent that it is vague, ambiguous, and overbroad. Plaintiff
 20 objects to this Interrogatory to the extent that the terms “authorized channels” and “otherwise”
 21 are vague and ambiguous. Plaintiff further objects to this Interrogatory as unduly
 22 burdensome, not relevant to any claim or defense, and disproportionate to the needs of the
 23 case.

24 Subject to the above general and specific objections and to the extent possible,
 25 Plaintiff responds that given that the requested information is unknown to Plaintiff and the
 26 Interrogatory is impossible to answer as written, Plaintiff is willing to meet and confer
 27 regarding the scope of information sought by this Interrogatory.

28 **INTERROGATORY NO. 10:**

1 DESCRIBE all damages or other injury YOU have allegedly suffered as a result of
 2 Meta's conduct alleged in the ACTION, including but not limited to IDENTIFICATION of all
 3 bases for such damages or injury, any financial figures or DOCUMENTS used or referenced
 4 as the basis for computing such damages, methodology for computing such damages and
 5 injury, and all PERSONS who supplied knowledge or information that informed the foregoing.

6 **RESPONSE TO INTERROGATORY NO. 10:**

7 Subject to and without waiving any of the general objections, and subject to such
 8 additional facts that may be adduced during discovery or otherwise in this litigation, Plaintiff
 9 objects to this Interrogatory to the extent that it is vague, ambiguous, and overbroad. Plaintiff
 10 objects to this Interrogatory to the extent that the term "damages" is vague and overbroad.
 11 Plaintiff objects to this Interrogatory as unduly burdensome, not relevant to any claim or
 12 defense, and disproportionate to the needs of the case, particularly because the interrogatory
 13 seeks "all PERSONS who supplied knowledge or information." Plaintiff objects to this
 14 Interrogatory to the extent that it calls for a response subject to the attorney-client privilege,
 15 work product doctrine, and/or any other applicable privilege or protection from disclosure.
 16 Plaintiff further objects to this Interrogatory to the extent that it is premature as it calls for
 17 information relating to damages that will be the subject of expert discovery, and objects to the
 18 extent that this Interrogatory seeks information related to expert witness work product. Plaintiff
 19 also objects to this Interrogatory on the grounds that the information requested is equally
 20 available to Defendant, or is already in its possession, custody, or control. Plaintiff objects to
 21 this Interrogatory to the extent that it is duplicative, in whole or in part, of Meta's First Set of
 22 Requests for Production Nos. 23, 24, 25, and 26.

23 Subject to the above general and specific objections Plaintiff will not respond to the
 24 Interrogatory at this time.

25 **INTERROGATORY NO. 11:**

26 IDENTIFY each PERSON, other than Plaintiffs' respective attorneys, who supplied
 27 information in response to Meta's discovery requests in this ACTION (including Document
 28 Requests, Requests for Admission, and Interrogatories propounded by Meta) and/or whose

1 Joseph R. Saveri (State Bar No. 130064)
2 Cadio Zirpoli (State Bar No. 179108)
3 Christopher K.L. Young (State Bar No.
318371)
4 Travis Manfredi (State Bar No. 281779)
5 Holden Benon (State Bar No. 325847)
6 Kathleen J. McMahon (State Bar No. 340007)
7 Aaron Cera (State Bar No. 351163)
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tmanfredi@saverilawfirm.com
hbenon@saverilawfirm.com
kmcmahon@saverilawfirm.com
acera@saverilawfirm.com

14 *Counsel for Individual and Representative
15 Plaintiffs and the Proposed Class*

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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

Richard Kadrey, et al.,

Individual and Representative Plaintiffs,

v.

Meta Platforms, Inc.,

Defendant.

Lead Case No. 3:23-cv-03417-VC

**PLAINTIFF JUNOT DÍAZ'S RESPONSES
AND OBJECTIONS TO DEFENDANT
META PLATFORMS, INC.'S FIRST SET
OF INTERROGATORIES**

OBJECTIONS AND RESPONSES TO INDIVIDUAL INTERROGATORIES

INTERROGATORY NO. 1:

IDENTIFY all PERSONS who had a role, involvement, and/or contribution to the creation of each of YOUR ASSERTED WORKS, including by providing (i) their contact information; (ii) a description of their role, involvement, or contribution; (iii) how if at all they were compensated; and (iv) whether there is any agreement with such PERSONS relating to the ownership of YOUR ASSERTED WORKS.

RESPONSE TO INTERROGATORY NO. 1:

Subject to and without waiving any of the general objections, and subject to such additional facts that may be adduced during discovery or otherwise in this litigation, Plaintiff objects to this Interrogatory to the extent that it is compound, overbroad and unduly burdensome. Each subpart is a separate Interrogatory, each which counts separately toward Plaintiffs' limit under the Federal Rules. Plaintiff objects to the terms "their role, involvement, and/or contribution" as vague and ambiguous. Plaintiff objects to the term "agreement" as vague and ambiguous. Plaintiff further objects to this Interrogatory as seeking information not relevant to any claim or defense, and disproportionate to the needs of the case, particularly because the interrogatory seeks "all PERSONS." Plaintiff further objects to this Interrogatory to the extent that it calls for a response subject to the attorney-client privilege, work product doctrine, and/or any other applicable privilege or protection from disclosure.

Subject to the above general and specific objections and to the extent possible, Plaintiff responds that he will identify only PERSONS, other than Plaintiff, a) who were direct aides (e.g., researchers), who were paid to contribute to the ASSERTED WORKS or b) those whose work was used in the ASSERTED WORKS under a license. Subject to the above general and specific objections, Plaintiff responds that neither (a) nor (b) is applicable to Plaintiff's ASSERTED WORKS.

INTERROGATORY NO. 2:

1 IDENTIFY all PERSONS (including, but not limited to YOU and YOUR publishers) who
 2 claim an ownership interest in any of YOUR ASSERTED WORKS (whether by assignment,
 3 license, or otherwise), including by providing (i) their contact information; and (ii) a description
 4 of their ownership interest.

5 **RESPONSE TO INTERROGATORY NO. 2:**

6 Subject to and without waiving any of the general objections, and subject to such
 7 additional facts that may be adduced during discovery or otherwise in this litigation, Plaintiff
 8 objects to this Interrogatory to the extent that it is vague, ambiguous, and overbroad. Plaintiff
 9 objects to this Interrogatory to the extent that the term "ownership interest" is vague and
 10 ambiguous. Plaintiff further objects to this Interrogatory as unduly burdensome, not relevant to
 11 any claim or defense, and disproportionate to the needs of the case. Plaintiff objects to this
 12 Interrogatory to the extent that it is duplicative, in whole or in part, of Meta's First Set of
 13 Requests for Production No. 10.

14 Subject to the above general and specific objections and to the extent possible,
 15 Plaintiff states that pursuant to Federal Rule of Civil Procedure 33, she will produce
 16 documents, identifying all PERSONS (including, but not limited to Plaintiff and his publishers)
 17 who claim an ownership interest in any of Plaintiff's ASSERTED WORKS (whether by
 18 assignment, license, or otherwise), which includes (i) their contact information; and (ii) a
 19 description of their ownership interest, if those documents exist. Plaintiff further refers
 20 Defendant to Plaintiff's response to Meta's First Set of Requests for Production No. 10.

21 **INTERROGATORY NO. 3:**

22 IDENTIFY and DESCRIBE the basis for YOUR assertion of copyright ownership in
 23 each of YOUR respective ASSERTED WORKS, including all evidence upon which YOU
 24 based such assertion.

25 **RESPONSE TO INTERROGATORY NO. 3:**

26 Subject to and without waiving any of the general objections, and subject to such
 27 additional facts that may be adduced during discovery or otherwise in this litigation, Plaintiff
 28 objects to this Interrogatory to the extent that it is vague, ambiguous, and overbroad. Plaintiff

1 disproportionate to the needs of the case, particularly because the interrogatory seeks “any
 2 COMMUNICATIONS.” Plaintiff further objects to this Interrogatory to the extent that it calls for
 3 a response subject to the attorney-client privilege, work product doctrine, and/or any other
 4 applicable privilege or protection from disclosure. Plaintiff objects to this Interrogatory to the
 5 extent that it is duplicative, in whole or in part, of Interrogatory Nos. 5, 6 and 7 and Meta’s
 6 First Set of Requests for Production Nos. 2 and 3.

7 Subject to the above general and specific objections and to the extent possible,
 8 Plaintiff responds that Plaintiff is willing to meet and confer to narrow the scope of this
 9 Interrogatory.

10 **INTERROGATORY NO. 9:**

11 IDENTIFY all authorized channels through which YOUR ASSERTED WORKS have
 12 been made available to the public, whether for sale or otherwise, including all websites (by
 13 URL) and retail outlets (by name and location) and the dates they were available in such
 14 channels.

15 **RESPONSE TO INTERROGATORY NO. 9:**

16 Subject to and without waiving any of the general objections, and subject to such
 17 additional facts that may be adduced during discovery or otherwise in this litigation, Plaintiff
 18 objects to this Interrogatory to the extent that it is vague, ambiguous, and overbroad. Plaintiff
 19 objects to this Interrogatory to the extent that the terms “authorized channels” and “otherwise”
 20 are vague and ambiguous. Plaintiff further objects to this Interrogatory as unduly
 21 burdensome, not relevant to any claim or defense, and disproportionate to the needs of the
 22 case.

23 Subject to the above general and specific objections and to the extent possible,
 24 Plaintiff responds that given that the requested information is unknown to Plaintiff and the
 25 Interrogatory is impossible to answer as written, Plaintiff is willing to meet and confer
 26 regarding the scope of information sought by this Interrogatory.

27 **INTERROGATORY NO. 10:**

1 DESCRIBE all damages or other injury YOU have allegedly suffered as a result of
 2 Meta's conduct alleged in the ACTION, including but not limited to IDENTIFICATION of all
 3 bases for such damages or injury, any financial figures or DOCUMENTS used or referenced
 4 as the basis for computing such damages, methodology for computing such damages and
 5 injury, and all PERSONS who supplied knowledge or information that informed the foregoing.

6 **RESPONSE TO INTERROGATORY NO. 10:**

7 Subject to and without waiving any of the general objections, and subject to such
 8 additional facts that may be adduced during discovery or otherwise in this litigation, Plaintiff
 9 objects to this Interrogatory to the extent that it is vague, ambiguous, and overbroad. Plaintiff
 10 objects to this Interrogatory to the extent that the term "damages" is vague and overbroad.
 11 Plaintiff objects to this Interrogatory as unduly burdensome, not relevant to any claim or
 12 defense, and disproportionate to the needs of the case, particularly because the interrogatory
 13 seeks "all PERSONS who supplied knowledge or information." Plaintiff objects to this
 14 Interrogatory to the extent that it calls for a response subject to the attorney-client privilege,
 15 work product doctrine, and/or any other applicable privilege or protection from disclosure.
 16 Plaintiff further objects to this Interrogatory to the extent that it is premature as it calls for
 17 information relating to damages that will be the subject of expert discovery, and objects to the
 18 extent that this Interrogatory seeks information related to expert witness work product. Plaintiff
 19 also objects to this Interrogatory on the grounds that the information requested is equally
 20 available to Defendant, or is already in its possession, custody, or control. Plaintiff objects to
 21 this Interrogatory to the extent that it is duplicative, in whole or in part, of Meta's First Set of
 22 Requests for Production Nos. 23, 24, 25, and 26.

23 Subject to the above general and specific objections Plaintiff will not respond to the
 24 Interrogatory at this time.

25 **INTERROGATORY NO. 11:**

26 IDENTIFY each PERSON, other than Plaintiffs' respective attorneys, who supplied
 27 information in response to Meta's discovery requests in this ACTION (including Document
 28 Requests, Requests for Admission, and Interrogatories propounded by Meta) and/or whose

1 Joseph R. Saveri (State Bar No. 130064)
2 Cadio Zirpoli (State Bar No. 179108)
3 Christopher K.L. Young (State Bar No.
318371)
4 Travis Manfredi (State Bar No. 281779)
5 Holden Benon (State Bar No. 325847)
6 Kathleen J. McMahon (State Bar No. 340007)
7 Aaron Cera (State Bar No. 351163)
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14 *Counsel for Individual and Representative
15 Plaintiffs and the Proposed Class*

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

Richard Kadrey, et al.,

Individual and Representative Plaintiffs,

v.

Meta Platforms, Inc.,

Defendant.

Lead Case No. 3:23-cv-03417-VC

**PLAINTIFF DAVID HENRY HWANG'S
RESPONSES AND OBJECTIONS TO
DEFENDANT META PLATFORMS, INC.'S
FIRST SET OF INTERROGATORIES**

1 **INTERROGATORY NO. 2:**

2 IDENTIFY all PERSONS (including, but not limited to YOU and YOUR publishers) who
3 claim an ownership interest in any of YOUR ASSERTED WORKS (whether by assignment,
4 license, or otherwise), including by providing (i) their contact information; and (ii) a description
5 of their ownership interest.

6 **RESPONSE TO INTERROGATORY NO. 2:**

7 Subject to and without waiving any of the general objections, and subject to such
8 additional facts that may be adduced during discovery or otherwise in this litigation, Plaintiff
9 objects to this Interrogatory to the extent that it is vague, ambiguous, and overbroad. Plaintiff
10 objects to this Interrogatory to the extent that the term "ownership interest" is vague and
11 ambiguous. Plaintiff further objects to this Interrogatory as unduly burdensome, not relevant to
12 any claim or defense, and disproportionate to the needs of the case. Plaintiff objects to this
13 Interrogatory to the extent that it is duplicative, in whole or in part, of Meta's First Set of
14 Requests for Production No. 10.

15 Subject to the above general and specific objections and to the extent possible,
16 Plaintiff states that pursuant to Federal Rule of Civil Procedure 33, she will produce
17 documents, identifying all PERSONS (including, but not limited to Plaintiff and his publishers)
18 who claim an ownership interest in any of Plaintiff's ASSERTED WORKS (whether by
19 assignment, license, or otherwise), which includes (i) their contact information; and (ii) a
20 description of their ownership interest, if those documents exist. Plaintiff further refers
21 Defendant to Plaintiff's response to Meta's First Set of Requests for Production No. 10.

22 **INTERROGATORY NO. 3:**

23 IDENTIFY and DESCRIBE the basis for YOUR assertion of copyright ownership in
24 each of YOUR respective ASSERTED WORKS, including all evidence upon which YOU
25 based such assertion.

26 **RESPONSE TO INTERROGATORY NO. 3:**

27 Subject to and without waiving any of the general objections, and subject to such
28 additional facts that may be adduced during discovery or otherwise in this litigation, Plaintiff

1 a response subject to the attorney-client privilege, work product doctrine, and/or any other
2 applicable privilege or protection from disclosure. Plaintiff objects to this Interrogatory to the
3 extent that it is duplicative, in whole or in part, of Interrogatory Nos. 5, 6 and 7 and Meta's
4 First Set of Requests for Production Nos. 2 and 3.

5 Subject to the above general and specific objections and to the extent possible,
6 Plaintiff responds that Plaintiff is willing to meet and confer to narrow the scope of this
7 Interrogatory.

8 **INTERROGATORY NO. 9:**

9 IDENTIFY all authorized channels through which YOUR ASSERTED WORKS have
10 been made available to the public, whether for sale or otherwise, including all websites (by
11 URL) and retail outlets (by name and location) and the dates they were available in such
12 channels.

13 **RESPONSE TO INTERROGATORY NO. 9:**

14 Subject to and without waiving any of the general objections, and subject to such
15 additional facts that may be adduced during discovery or otherwise in this litigation, Plaintiff
16 objects to this Interrogatory to the extent that it is vague, ambiguous, and overbroad. Plaintiff
17 objects to this Interrogatory to the extent that the terms "authorized channels" and "otherwise"
18 are vague and ambiguous. Plaintiff further objects to this Interrogatory as unduly
19 burdensome, not relevant to any claim or defense, and disproportionate to the needs of the
20 case.

21 Subject to the above general and specific objections and to the extent possible,
22 Plaintiff responds that given that the requested information is unknown to Plaintiff and the
23 Interrogatory is impossible to answer as written, Plaintiff is willing to meet and confer
24 regarding the scope of information sought by this Interrogatory.

25 **INTERROGATORY NO. 10:**

26 DESCRIBE all damages or other injury YOU have allegedly suffered as a result of
27 Meta's conduct alleged in the ACTION, including but not limited to IDENTIFICATION of all
28 bases for such damages or injury, any financial figures or DOCUMENTS used or referenced

1 as the basis for computing such damages, methodology for computing such damages and
 2 injury, and all PERSONS who supplied knowledge or information that informed the foregoing.

3 **RESPONSE TO INTERROGATORY NO. 10:**

4 Subject to and without waiving any of the general objections, and subject to such
 5 additional facts that may be adduced during discovery or otherwise in this litigation, Plaintiff
 6 objects to this Interrogatory to the extent that it is vague, ambiguous, and overbroad. Plaintiff
 7 objects to this Interrogatory to the extent that the term "damages" is vague and overbroad.
 8 Plaintiff objects to this Interrogatory as unduly burdensome, not relevant to any claim or
 9 defense, and disproportionate to the needs of the case, particularly because the interrogatory
 10 seeks "all PERSONS who supplied knowledge or information." Plaintiff objects to this
 11 Interrogatory to the extent that it calls for a response subject to the attorney-client privilege,
 12 work product doctrine, and/or any other applicable privilege or protection from disclosure.
 13 Plaintiff further objects to this Interrogatory to the extent that it is premature as it calls for
 14 information relating to damages that will be the subject of expert discovery, and objects to the
 15 extent that this Interrogatory seeks information related to expert witness work product. Plaintiff
 16 also objects to this Interrogatory on the grounds that the information requested is equally
 17 available to Defendant, or is already in its possession, custody, or control. Plaintiff objects to
 18 this Interrogatory to the extent that it is duplicative, in whole or in part, of Meta's First Set of
 19 Requests for Production Nos. 23, 24, 25, and 26.

20 Subject to the above general and specific objections Plaintiff will not respond to the
 21 Interrogatory at this time.

22 **INTERROGATORY NO. 11:**

23 IDENTIFY each PERSON, other than Plaintiffs' respective attorneys, who supplied
 24 information in response to Meta's discovery requests in this ACTION (including Document
 25 Requests, Requests for Admission, and Interrogatories propounded by Meta) and/or whose
 26 DOCUMENTS or data were consulted in connection with such responses, and, as to the
 27 Interrogatories, specify for which Interrogatories such PERSON has supplied information.

28 **RESPONSE TO INTERROGATORY NO. 11:**

1 Joseph R. Saveri (State Bar No. 130064)
2 Cadio Zirpoli (State Bar No. 179108)
3 Christopher K.L. Young (State Bar No.
318371)
4 Travis Manfredi (State Bar No. 281779)
5 Holden Benon (State Bar No. 325847)
6 Kathleen J. McMahon (State Bar No. 340007)
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14 *Counsel for Individual and Representative
15 Plaintiffs and the Proposed Class*

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

Richard Kadrey, et al.,

Individual and Representative Plaintiffs,

v.

Meta Platforms, Inc.,

Defendant.

Lead Case No. 3:23-cv-03417-VC

**PLAINTIFF RACHEL LOUISE SNYDER 'S
RESPONSES AND OBJECTIONS TO
DEFENDANT META PLATFORMS, INC.'S
FIRST SET OF INTERROGATORIES**

1 **INTERROGATORY NO. 2:**

2 IDENTIFY all PERSONS (including, but not limited to YOU and YOUR publishers) who
3 claim an ownership interest in any of YOUR ASSERTED WORKS (whether by assignment,
4 license, or otherwise), including by providing (i) their contact information; and (ii) a description
5 of their ownership interest.

6 **RESPONSE TO INTERROGATORY NO. 2:**

7 Subject to and without waiving any of the general objections, and subject to such
8 additional facts that may be adduced during discovery or otherwise in this litigation, Plaintiff
9 objects to this Interrogatory to the extent that it is vague, ambiguous, and overbroad. Plaintiff
10 objects to this Interrogatory to the extent that the term "ownership interest" is vague and
11 ambiguous. Plaintiff further objects to this Interrogatory as unduly burdensome, not relevant to
12 any claim or defense, and disproportionate to the needs of the case. Plaintiff objects to this
13 Interrogatory to the extent that it is duplicative, in whole or in part, of Meta's First Set of
14 Requests for Production No. 10.

15 Subject to the above general and specific objections and to the extent possible,
16 Plaintiff states that pursuant to Federal Rule of Civil Procedure 33, she will produce
17 documents, identifying all PERSONS (including, but not limited to Plaintiff and her publishers)
18 who claim an ownership interest in any of Plaintiff's ASSERTED WORKS (whether by
19 assignment, license, or otherwise), which includes (i) their contact information; and (ii) a
20 description of their ownership interest, if those documents exist. Plaintiff further refers
21 Defendant to Plaintiff's response to Meta's First Set of Requests for Production No. 10.

22 **INTERROGATORY NO. 3:**

23 IDENTIFY and DESCRIBE the basis for YOUR assertion of copyright ownership in
24 each of YOUR respective ASSERTED WORKS, including all evidence upon which YOU
25 based such assertion.

26 **RESPONSE TO INTERROGATORY NO. 3:**

27 Subject to and without waiving any of the general objections, and subject to such
28 additional facts that may be adduced during discovery or otherwise in this litigation, Plaintiff

1 **INTERROGATORY NO. 10:**

2 DESCRIBE all damages or other injury YOU have allegedly suffered as a result of
3 Meta's conduct alleged in the ACTION, including but not limited to IDENTIFICATION of all
4 bases for such damages or injury, any financial figures or DOCUMENTS used or referenced
5 as the basis for computing such damages, methodology for computing such damages and
6 injury, and all PERSONS who supplied knowledge or information that informed the foregoing.

7 **RESPONSE TO INTERROGATORY NO. 10:**

8 Subject to and without waiving any of the general objections, and subject to such
9 additional facts that may be adduced during discovery or otherwise in this litigation, Plaintiff
10 objects to this Interrogatory to the extent that it is vague, ambiguous, and overbroad. Plaintiff
11 objects to this Interrogatory to the extent that the term "damages" is vague and overbroad.
12 Plaintiff objects to this Interrogatory as unduly burdensome, not relevant to any claim or
13 defense, and disproportionate to the needs of the case, particularly because the interrogatory
14 seeks "all PERSONS who supplied knowledge or information." Plaintiff objects to this
15 Interrogatory to the extent that it calls for a response subject to the attorney-client privilege,
16 work product doctrine, and/or any other applicable privilege or protection from disclosure.
17 Plaintiff further objects to this Interrogatory to the extent that it is premature as it calls for
18 information relating to damages that will be the subject of expert discovery, and objects to the
19 extent that this Interrogatory seeks information related to expert witness work product. Plaintiff
20 also objects to this Interrogatory on the grounds that the information requested is equally
21 available to Defendant, or is already in its possession, custody, or control. Plaintiff objects to
22 this Interrogatory to the extent that it is duplicative, in whole or in part, of Meta's First Set of
23 Requests for Production Nos. 23, 24, 25, and 26.

24 Subject to the above general and specific objections Plaintiff will not respond to the
25 Interrogatory at this time.

26 **INTERROGATORY NO. 11:**

27 IDENTIFY each PERSON, other than Plaintiffs' respective attorneys, who supplied
28 information in response to Meta's discovery requests in this ACTION (including Document

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9 *Counsel for Plaintiffs and the Proposed
10 Class, Additional Counsel Listed Below*

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

10 RICHARD KADREY, SARAH SILVERMAN,
11 CHRISTOPHER GOLDEN, TA-NEHISI
12 COATES, JUNOT DÍAZ, ANDREW SEAN
13 GREER, DAVID HENRY HWANG,
14 MATTHEW KLAM, LAURA LIPPMAN,
15 RACHEL LOUISE SNYDER, JACQUELINE
16 WOODSON, AND LYSA TERKEURST,
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Individual and Representative Plaintiffs,
v.
META PLATFORMS, INC.;
Defendant.

Case No. 3:23-cv-03417-VC

PLAINTIFF LYSA TERKEURST'S
RESPONSES AND OBJECTIONS TO
DEFENDANT META PLATFORMS,
INC.'S FIRST SET OF
INTERROGATORIES

PROPOUNDING PARTY: **Defendant Meta Platforms, Inc.**
RESPONDING PARTY: **Lysa TerKeurst**
SET NUMBER: **One (1)**

Pursuant to Rules 26 and 33 of the Federal Rules of Civil Procedure, Plaintiff Lysa TerKeurst ("Plaintiff") in the above-titled action hereby responds to Defendant Meta Platforms, Inc.'s ("Defendant" or "Meta") First Set of Interrogatories (the "Interrogatories"). Because certain of Plaintiff's responses and objections contain personal identifying information which would cause substantial harm if revealed, Plaintiff designates these responses and objections as Highly Confidential.

1 Amanda Bacon – Senior Content Coordinator and Executive Assistant. Responsible for
2 saving content into files, content tracking. Also responsible for gathering initial chapters on works,
3 and engages focus groups for feedback.

4 Shae Hill – Content Manager, responsible for taking content from book writing and
5 converting into internet, magazine, newspaper, and other media content.

6 In addition, Plaintiff identifies Jessica Rogers, who is the lead editor at HarperCollins,
7 Plaintiff's publisher, who is responsible for editing and publishing Plaintiff's works. Ms. Rogers
8 can be contacted through her employer, HarperCollins .

9 **INTERROGATORY NO. 2:**

10 IDENTIFY all PERSONS (including, but not limited to YOU and YOUR publishers) who
11 claim an ownership interest in any of YOUR ASSERTED WORKS (whether by assignment,
12 license, or otherwise), including by providing (i) their contact information; and (ii) a description
13 of their ownership interest.

14 **RESPONSE TO INTERROGATORY NO. 2:**

15 Subject to and without waiving any of the general objections, and subject to such additional
16 facts that may be adduced during discovery or otherwise in this litigation, Plaintiff objects to this
17 Interrogatory to the extent that it is vague, ambiguous, and overbroad. Plaintiff objects to this
18 Interrogatory to the extent that the term "ownership interest" is vague and ambiguous. Plaintiff
19 further objects to this Interrogatory as unduly burdensome, not relevant to any claim or defense,
20 and disproportionate to the needs of the case. Plaintiff objects to this Interrogatory to the extent
21 that it is duplicative, in whole or in part, of Meta's First Set of Requests for Production No. 10.

22 Subject to the above general and specific objections and to the extent possible, Plaintiff
23 states that pursuant to Federal Rule of Civil Procedure 33, she will produce documents, identifying
24 all PERSONS (including, but not limited to Plaintiff and her publishers) who claim an ownership
25 interest in any of Plaintiff's ASSERTED WORKS (whether by assignment, license, or otherwise),
26 which includes (i) their contact information; and (ii) a description of their ownership interest, if
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28

1 those documents exist. Plaintiff will supplement this response by identifying the responsive
2 documents by Bates number once produced.

3 **INTERROGATORY NO. 3:**

4 IDENTIFY and DESCRIBE the basis for YOUR assertion of copyright ownership in each
5 of YOUR respective ASSERTED WORKS, including all evidence upon which YOU based such
6 assertion.

7 **RESPONSE TO INTERROGATORY NO. 3:**

8 Subject to and without waiving any of the general objections, and subject to such additional
9 facts that may be adduced during discovery or otherwise in this litigation, Plaintiff objects to this
10 Interrogatory to the extent that it is vague, ambiguous, and overbroad. Plaintiff objects to this
11 Interrogatory to the extent that the term “basis for YOUR assertion” is vague and the term
12 “copyright ownership” is ambiguous. Plaintiff further objects to this Interrogatory as unduly
13 burdensome, not relevant to any claim or defense, and disproportionate to the needs of the case,
14 particularly because the interrogatory seeks “all evidence.”

15 Subject to the above general and specific objections, Plaintiff responds that Plaintiff has
16 copyright ownership of the ASSERTED WORKS because Plaintiff is the author of the
17 ASSERTED WORKS. Answering further, Plaintiff refers Meta to information available via the
18 U.S. Copyright Office and/or the Library of Congress related to Plaintiff’s ASSERTED WORKS.
19 Plaintiff will also produce documents providing evidence of copyright ownership, and will
20 supplement this answer identifying the Bates ranges of these documents, once produced.

21 **INTERROGATORY NO. 4:**

22 For each of YOUR ASSERTED WORKS, IDENTIFY each instance in which another
23 PERSON has been licensed, permitted, or authorized to copy, display, distribute, publicly perform,
24 or otherwise exercise any Section 106 rights with respect to each ASSERTED WORK, including
25 by providing the date, PERSON, and agreement regarding each instance.

26 **RESPONSE TO INTERROGATORY NO. 4:**

1 and assistants regarding the fact that her ASSERTED WORKS were included in the Books3
2 dataset.

3 **INTERROGATORY NO. 9:**

4 IDENTIFY all authorized channels through which YOUR ASSERTED WORKS have
5 been made available to the public, whether for sale or otherwise, including all websites (by URL)
6 and retail outlets (by name and location) and the dates they were available in such channels.

7 **RESPONSE TO INTERROGATORY NO. 9:**

8 Subject to and without waiving any of the general objections, and subject to such additional
9 facts that may be adduced during discovery or otherwise in this litigation, Plaintiff objects to this
10 Interrogatory to the extent that it is vague, ambiguous, and overbroad. Plaintiff objects to this
11 Interrogatory to the extent that the terms “authorized channels” and “otherwise” are vague and
12 ambiguous. Plaintiff further objects to this Interrogatory as unduly burdensome, not relevant to
13 any claim or defense, and disproportionate to the needs of the case.

14 Subject to the above general and specific objections, Plaintiff responds that copies of
15 Plaintiffs’ ASSERTED WORKS have been available to purchase through the following
16 distribution channels: directly from her ministry (Proverbs31 Ministries), and also through online
17 retailers (e.g., Amazon), e-book retailers (e.g., Kindle), and brick and mortar retailers.

18 **INTERROGATORY NO. 10:**

19 DESCRIBE all damages or other injury YOU have allegedly suffered as a result of Meta’s
20 conduct alleged in the ACTION, including but not limited to IDENTIFICATION of all bases for
21 such damages or injury, any financial figures or DOCUMENTS used or referenced as the basis for
22 computing such damages, methodology for computing such damages and injury, and all
23 PERSONS who supplied knowledge or information that informed the foregoing.

24 **RESPONSE TO INTERROGATORY NO. 10:**

25 Subject to and without waiving any of the general objections, and subject to such additional
26 facts that may be adduced during discovery or otherwise in this litigation, Plaintiff objects to this
27 Interrogatory to the extent that it is vague, ambiguous, and overbroad. Plaintiff objects to this

1 Interrogatory to the extent that the term “damages” is vague and overbroad. Plaintiff objects to this
 2 Interrogatory as unduly burdensome, not relevant to any claim or defense, and disproportionate to
 3 the needs of the case, particularly because the interrogatory seeks “all PERSONS who supplied
 4 knowledge or information.” Plaintiff objects to this Interrogatory to the extent that it calls for a
 5 response subject to the attorney-client privilege, work product doctrine, and/or any other
 6 applicable privilege or protection from disclosure. Plaintiff further objects to this Interrogatory to
 7 the extent that it is premature as it calls for information relating to damages that will be the subject
 8 of expert discovery, and objects to the extent that this Interrogatory seeks information related to
 9 expert witness work product. Plaintiff also objects to this Interrogatory on the grounds that the
 10 information requested is equally available to Defendant, or is already in its possession, custody, or
 11 control. Plaintiff objects to this Interrogatory to the extent that it is duplicative, in whole or in part,
 12 of Meta’s First Set of Requests for Production Nos. 23, 24, 25, and 26.

13 Subject to the above general and specific objections, Plaintiffs are still investigating how
 14 Meta’s nascent technology is causing them harm. Plaintiff will supplement this response, and will
 15 provide reference to the Bates numbers of responsive documents, once produced.

16 **INTERROGATORY NO. 11:**

17 IDENTIFY each PERSON, other than Plaintiffs’ respective attorneys, who supplied
 18 information in response to Meta’s discovery requests in this ACTION (including Document
 19 Requests, Requests for Admission, and Interrogatories propounded by Meta) and/or whose
 20 DOCUMENTS or data were consulted in connection with such responses, and, as to the
 21 Interrogatories, specify for which Interrogatories such PERSON has supplied information.

22 **RESPONSE TO INTERROGATORY NO. 11:**

23 Subject to and without waiving any of the general objections, and subject to such additional
 24 facts that may be adduced during discovery or otherwise in this litigation, Plaintiff objects to this
 25 Interrogatory to the extent that it is vague, ambiguous, and overbroad. Plaintiff objects to this
 26 Interrogatory to the extent that the term “data” is vague and ambiguous. Plaintiff further objects to
 27 this Interrogatory as unduly burdensome, not relevant to any claim or defense, and disproportionate